

1 LEWIS, FEINBERG, LEE, RENAHER & JACKSON, P.C.

JEFFREY LEWIS, SBN 066587

2 jlewis@lewisfeinberg.com

ANDREW LAH, SBN 234580

3 alah@lewisfeinberg.com

DARIN RANAHAN, SBN 273532

4 dranahan@lewisfeinberg.com

MICHAEL CAESAR, SBN 280548

5 mcaesar@lewisfeinberg.com

LINDA LAM, SBN 301461

6 llam@lewisfeinberg.com

7 476 9th Street

Oakland, CA 94607

8 Telephone: (510) 839-6824

Facsimile: (510) 839-7839

9 HANSON BRIDGETT LLP

10 RAYMOND F. LYNCH, SBN 119065

rlynch@hansonbridgett.com

11 LAWRENCE M. CIRELLI, SBN 114710

lcirelli@hansonbridgett.com

12 STEPHEN B. PECK, SBN 72214

speck@hansonbridgett.com

13 MATTHEW J. PECK, SBN 287934

mpeck@hansonbridgett.com

14 425 Market Street, 26th Floor

San Francisco, CA 94105

15 Telephone: (415) 777-3200

Facsimile: (415) 541-9366

16 Attorneys for Defendant

17 CONTRA COSTA COUNTY

18 **UNITED STATES DISTRICT COURT**

19 **NORTHERN DISTRICT OF CALIFORNIA**

20
21 RETIREE SUPPORT GROUP OF CONTRA
COSTA COUNTY,

22 Plaintiff,

23 v.

24 CONTRA COSTA COUNTY,

25 Defendant.

CASE NO. C 12-00944 JST

26 **STIPULATION EXTENDING CASE
DEADLINES AND ~~PROPOSED~~ ORDER**

Judge: Hon. Jon S. Tigar

27 This is a complex case involving claims brought by Plaintiff Retiree Support Group of
28 Contra Costa County ("RSG") on behalf of retirees of Defendant Contra Costa County (the

"County") (collectively, the "Parties") claiming a vested right in certain healthcare subsidies as is more fully stated in Plaintiff's First Amended Complaint.

The Parties have engaged in substantial discovery and there still remains a significant amount of discovery to be completed before this case is ready for trial;

RSG and the County have agreed to engage in mediation and to devote their best efforts to that process, which will be complex and time consuming given the nature of this case;

The Parties wish to continue the trial date for 6.5 months (201 days), and to continue case deadlines accordingly, to allow the Parties sufficient time to explore settlement through mediation;

The Court's Scheduling Orders provide the present case deadlines (Dkts. 91, 97 and 112);

The Parties, by and through their respective counsel of record, hereby stipulate and agree that there is good cause to continue all case deadlines as follows pursuant to Federal Rule of Civil Procedure 16 and Civil Local Rule 16-10 and request the Court approve and so order:

Event	Deadline
Case Management Conference	9/3/15
Expert disclosures	9/14/15
Fact discovery cut-off	10/12/15
Expert rebuttal	10/14/15
Expert discovery cut-off	10/30/15
Deadline to file dispositive motions	11/6/15
Pretrial conference statement due	1/5/16
Pretrial conference	1/12/16 at 2:00 p.m. or such other date available on the Court's schedule 1/22/16 at 2:00 p.m.
Bench trial	2/15/16 at 8:30 a.m. or such other date available on the Court's trial schedule

///

///

1 ///

2
3 **IT IS SO STIPULATED.**

4 DATED: March 3, 2015

LEWIS, FEINBERG, LEE, RENAKER &
JACKSON, P.C.

6 By: _____/s/_____
ANDREW LAH
7 Attorneys for Plaintiff
8 RETIREE SUPPORT GROUP OF CONTRA
COSTA COUNTY

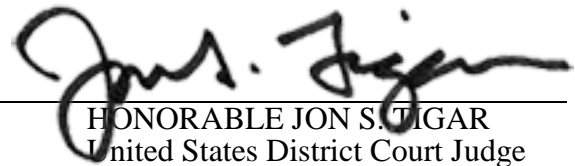
9
10 DATED: March 3, 2015

HANSON BRIDGETT LLP

11
12 By: _____/s/_____
RAYMOND F. LYNCH
13 Attorneys for Defendant
CONTRA COSTA COUNTY

14
15
16 **IT IS SO ORDERED.**

17 Dated: March 5, 2015

18 
HONORABLE JON S. TIGAR
United States District Court Judge

SIGNATURES UNDER GENERAL ORDER NO. 45

Pursuant to General Order No. 45 of the United States District Court, Northern District of California, I, Raymond F. Lynch—the ECF User whose User ID and Password are used in the filing of this document—hereby attest that the concurrence to the filing of this document has been obtained from each of the other signatories to this document.

/s/ _____
Raymond F. Lynch